

1 Mark C. Scarsi (SBN 183926)
mscarsi@milbank.com
2 Ashlee N. Lin (SBN 275267)
anlin@milbank.com
3 MILBANK, TWEED, HADLEY & McCLOY LLP
2029 Century Park East 33rd Floor
4 Los Angeles, California 90067
Telephone: (424) 386-4000
5 Facsimile: (213) 629-5063

6 *Attorneys for Defendants*
Cambridge Analytica LLC and SCL Group Ltd.
7
8

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**
12

13 JONATHAN D. RUBIN, on behalf of
14 himself and all others similarly situated,

15 Plaintiff,

16 v.

17 FACEBOOK, INC.; SCL GROUP LTD.;
18 CAMBRIDGE ANALYTICA, LLC; AND
SCIENCE RESEARCH LTD.,

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No. 3:18-cv-01852-VC

**DECLARATION OF ASHLEE N. LIN
IN SUPPORT OF MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS CAMBRIDGE
ANALYTICA, LLC AND SCL GROUP
LTD. TO RESPOND TO COMPLAINT**

Hearing Date: May 24, 2018

Hearing Time: 10:00 a.m.

Department: Courtroom 4, 17th Floor

Judge: Hon. Vince Chhabria

DECLARATION OF ASHLEE N. LIN

I, Ashlee N. Lin, hereby declare as follows:

1. I am duly licensed to practice law in the State of California, and admitted to the bar of the United States District Court for the Northern District of California. I am an associate with the firm of Milbank, Tweed, Hadley & McCloy LLP ("Milbank"), counsel for Defendants Cambridge Analytica, LLC ("CA") and SCL Group Ltd. ("SCL"). I submit this declaration in support of the Motion for Extension of Time for Defendants Cambridge Analytica, LLC and SCL Group Ltd. to Respond to Complaint.

2. Since March 20, 2018, eighteen actions (in addition to the present action) have been filed across nine different jurisdictions against CA and/or SCL:

- *O'Hara et al. v. Facebook, Inc. et al.*, C.D. Cal. Case No. 8:18-cv-00571
- *Redmond et al. v. Facebook, Inc. et al.*, D. Del. Case No. 1:18-cv-00531
- *Malskoff et al. v. Facebook, Inc., et al.*, D.N.J. Case No. 2:18-cv-04451
- *Williams v. Facebook, Inc. et al.*, N.D. Ala. Case No. 2:18-cv-00535
- *Price v. Facebook, Inc. et al.*, N.D. Cal. Case No. 3:18-cv-01732
- *Rubin v. Facebook, Inc. et al.*, N.D. Cal. Case No. 3:18-cv-01852
- *Gennock v. Facebook, Inc. et al.*, N.D. Cal. Case No. 3:18-cv-01891
- *O'Kelly v. Facebook, Inc. et al.*, N.D. Cal. Case No. 3:18-cv-01915
- *Beiner et al. v. Facebook, Inc. et al.*, N.D. Cal. Case No. 3:18-cv-01953
- *Haslinger v. Facebook, Inc. et al.*, N.D. Cal. Case No. 3:18-cv-01984
- *Picha v. Facebook, Inc. et al.*, N.D. Cal. Case No. 3:18-cv-02090
- *King v. Facebook, Inc. et al.*, N.D. Cal. Case No. 3:18-cv-02276
- *Kooser et al. v. Facebook, Inc. et al.*, N.D. Cal. Case No. 4:18-cv-02009
- *Labajo v. Facebook, Inc. et al.*, N.D. Cal. Case No. 4:18-cv-02093
- *Comforte et al. v. Cambridge Analytica et al.*, N.D. Ill. Case No. 1:18-cv-02120
- *People of the State of Illinois v. Facebook, Inc. et al.*, N.D. Cal. Ill. 1:18-cv-02667
- *Lodowski v. Facebook, Inc., et al.*, S.D. Tex. Case No. 4:18-cv-00907

- *Johnson v. Wylie et al.*, W.D. Pa. 2:18-cv-00415
- *Ortiz v. Cambridge Analytica, LLC*, N.Y. Sup. Ct. 153162/2018

Seventeen of these actions are proposed class actions.

3. Since March 20, 2018, CA and/or SCL received multiple subpoenas from three different attorney general offices across the country and also received various complaints from the Federal Election Commission.

4. Counsel for CA and SCL were retained in this matter on or around April 12, 2018.

5. On April 18, 2018, Counsel reached out to Plaintiff's counsel to seek an extension of time for CA and SCL to respond to the Complaint. Over the next two days, CA and SCL counsel discussed with Plaintiff's counsel the requested extension. Attached hereto as **Exhibit A** is a true and correct copy of correspondence between an associate at my firm and counsel for Plaintiff.

6. CA and SCL are and have been actively trying to secure consent for a similar extension from the plaintiffs in each of the actions, and have secured such consent from a majority of the plaintiffs.

7. Attached as **Exhibit B** is email correspondence between an associate at my firm and counsel for the *Haslinger* plaintiffs.

8. Attached as **Exhibit C** is email correspondence between an associate at my firm and counsel for the *Beiner* plaintiffs.

9. Over the past few weeks, CA and/or SCL have been in the process of trying to respond to the nineteen different litigations that have been filed all over the country. CA and SCL are also in the process of responding to multiple subpoenas for documents and information from different attorneys general. CA and SCL are also in the process of responding to complaints from the Federal Election Commission. CA and SCL have also been preparing a brief in response to the Motion to Consolidate pending before the JPML.

1 10. While CA and SCL (and their counsel) have been working diligently to address
2 each matter, CA and SCL simply require more time to meaningful investigate and respond to
3 each of the allegations in Plaintiff's complaint and prepare their defenses.

4
5 Executed this 20th day of April, 2018 at Los Angeles, California.

6 /s/ Ashlee N. Lin
7 Ashlee N. Lin
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served via the Court's CM/ECF system on all counsel of record on April 20, 2018.

/s/ Ashlee N. Lin
Ashlee N. Lin